

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

HAMMOND DEVELOPMENT  
INTERNATIONAL, INC.

Plaintiff,

v.

AMAZON.COM, INC.,  
AMAZON.COM LLC,  
AMAZON.COM SERVICES, INC.  
AND  
AMAZON WEB SERVICES, INC.

Defendants.

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CIVIL ACTION No. 6:19-cv-00355-ADA

JURY TRIAL DEMANDED

**[LEAD CASE]**

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HAMMOND DEVELOPMENT  
INTERNATIONAL, INC.

Plaintiff,

v.

GOOGLE LLC

Defendant.

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CIVIL ACTION No. 6:19-cv-00356-ADA

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF PROTECTIVE AND ESI ORDERS**

Pursuant to the Court's guidance at the telephone conference on February 3, 2020, the Parties respectfully move for entry of the attached proposed Protective Order and ESI Order in the above-captioned consolidated cases.

Dated: February 21, 2020

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5(b)(1), I hereby certify that the foregoing document was electronically filed with the Clerk of Court using the CM/ECF filing system, which will generate and send an e-mail notification of said filing to all counsel of record, on this the 21st day of February, 2020.

A handwritten signature in black ink, appearing to read "Andrew J. Wright", with a stylized flourish at the end.

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ANDREW J. WRIGHT